

ESTTA Tracking number: **ESTTA697457**

Filing date: **09/22/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91222962
Party	Defendant Angel Quintana
Correspondence Address	ANTHONY M VERNA III VERNA LAW 170 KINGS FERRY ROAD, FLOOR 2 MONTROSE, NY 10548 UNITED STATES anthony@vernalaw.com
Submission	Answer
Filer's Name	Anthony M. Verna III
Filer's e-mail	anthony@vernalaw.com
Signature	/s Anthony M. Verna III s/
Date	09/22/2015
Attachments	answer - Quintana - SIGNATURE SYSTEM.pdf(279788 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Heart of Success, Inc.)	Opposition No.: 91222962
)	
Plaintiff/Opposer,)	
)	
vs.)	
)	
Angel Quintana)	
)	
Defendant/Applicant)	
)	
)	
)	

ANSWER

Angel Quintana (“Defendant” or “Applicant”), through her attorney, Anthony M. Verna III, hereby answers the Amended Notice of Opposition that Heart of Success, Inc. (“Plaintiff” or “Opposer”) filed on September 11, 2015 as follows:

1. Applicant does not have enough information to either admit or deny the averments of this paragraph.
2. Applicant does not have enough information to either admit or deny the averments of this paragraph.
3. Applicant does not have enough information to either admit or deny the averments of this paragraph.
4. Applicant denies the averments of this paragraph.
5. Applicant does not have enough information to either admit or deny the averments of this paragraph.
6. Applicant denies the averments of this paragraph.
7. Applicant denies the averments of this paragraph.
8. Applicant denies the averments of this paragraph.
9. Applicant denies the averments of this paragraph.
10. Applicant denies the averments of this paragraph.

Wherefore, Angel Quintana requests that the notice to U.S. Serial Number, 86512479, SIGNATURE SYSTEM, be denied and the mark be allowed to register.

Dated: September 22, 2015

/s Anthony M. Verna III
Anthony M. Verna III, Esq.
Verna Law, P.C.
445 Hamilton Ave., Ste. 1102
White Plains, NY 10601

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Heart of Success, Inc.)	Opposition No.: 91222962
)	
Plaintiff/Opposer,)	
)	
vs.)	
)	
Angel Quintana)	
)	
Defendant/Applicant)	
)	
)	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 22nd day of September 2015, a copy of the foregoing Answer was served via First Class Mail, postage prepaid, on the following:

Francine Ward
Law Ofc. of Francine D. Ward
775 East Blithedale Ste. 325
Mill Valley, CA 94941

Respectfully submitted,

Dated this September 22, 2015

/s/ Anthony M. Verna III
Anthony M. Verna III, Esq.
Verna Law, P.C.
445 Hamilton Ave., Ste. 1102
White Plains, NY 10601